



3 1761 12062589 2

CALL NO.
CA1
MI 800
-82S001

GOVT

Employment and
Immigration Canada

John Roberts, Minister

Emploi et
Immigration Canada

John Roberts, Ministre

Government
Publication

Background Paper 1

SKILL DEVELOPMENT LEAVE IN
SELECTED INDUSTRIAL SOCIETIES:
1970 - 1983

Alan M. Thomas

Skill Development Leave Task Force

Background
Paper

Canada



CAI
MI 800
-825001

Background Paper 1

SKILL DEVELOPMENT LEAVE IN
SELECTED INDUSTRIAL SOCIETIES:
1970 - 1983

Alan M. Thomas

Ontario Institute for Studies
in Education


1983

This is one in a series of background papers prepared for the Task Force on Skill Development Leave. The opinions expressed are those of the author(s) and do not necessarily reflect the views of the Task Force or the Department of Employment and Immigration.



CONTENTS

	<u>PAGE</u>
Author's Note	i
Introduction	1
Purposes	13
Mechanisms	20
Principal Locations for Training	26
Participation	29
Strengths and Weaknesses	33
Conclusion	42
References	



Digitized by the Internet Archive
in 2025 with funding from
University of Toronto

<https://archive.org/details/31761120625892>

Author's Note:

The term "Skill Development Leave" (SDL) is a term recently adopted for the Task Force project. Almost all of the information contained in the following paper has been drawn from material devoted to the examination of "Paid Educational Leave" (PEL) in various countries. While the adoption of the new term SDL may seem capricious in the face of the more widely established PEL, a close examination of the developments since the publication of the report "Education and Working Canadians" indicates that the practices under examination in reports devoted to "paid educational leave" have been broadening so relentlessly as to present serious problems of definition. Therefore, the adoption of the term SDL suggests not simply an alternative term for the earlier one, but an evolution of practice that allows for distinct definition. SDL suggests practices more related to the achieving of specific objectives, "skills," rather than to the means of effecting change in human individuals, "education." While it smacks, somewhat more of what has been in the past considered as "training," an emphasis to be expected in federal government adventures in these areas, nevertheless, one can talk with reasonable comfort of intellectual, managerial, professional, and other kinds of skills. The recent decision of the Ontario Supreme Court (see *Seafarers' Training Institute vs. the Corporation of the Township of Williamsburg*, Supreme Court of Ontario (Divisional Court), May 26, 1982) to the effect that in the eyes of the law there is no difference between education and training, would further suggest a rapid decline in the conventional distinctions between the two and the emergence of newly formulated concepts related to the accomplishment of learning

objectives of both individual and collective types. For these reasons, the steady development of practices associated with PEL, and the conceptual changes taking place with respect to education and training, it seems sensible to accept at least provisionally the new term, Skill Development Leave, and to discover if it represents a different ideology than PEL, a sub-system of practices falling within PEL, or a more inclusive term on its own. Because the literature on which this paper is based describes itself as being devoted to PEL, we will use that term at the outset in order to avoid confusion. However, we will deal with the definitional problem early in the text in order to indicate how difficult it has become to apply any single concept of PEL to the activities involving absence from the work place that have evolved in the past decade.

The author would like to thank Ms. Jane Adams and Ms. Karen Dunbar for their assistance in producing this paper. Needless to say, the opinions expressed are the author's own.

Introduction

The Report of the Commission of Inquiry on Educational Leave and Productivity concluded its review of five European countries, France, Belgium, West Germany, Sweden and Great Britain, with:

In summary educational leave is well established in the countries visited by the Commission. It is accepted in principle by all the parties of interest. The right to educational leave has not caused major disruptions to company operations nor has the cost created onerous and unacceptable burdens on industry. Educational leave policy has been most successful in expanding vocational training thereby improving the vocational competence of the labour force and in providing opportunities to workers' representatives so that they might acquire the knowledge necessary to perform their duties in an informed and responsible manner. It has been least successful to date in overcoming educational inequities. (Adams, Draper, & Ducharme, 1979, p. 76)

The four years since the publication of the Commission's Report have been a curious period for the phenomenon of Paid Educational Leave. At the time of the publication of the Report, economic indicators of every sort were gloomy, and the experience of those four years has proven most of them correct. In that atmosphere, the Report received a predictably mixed reception from the major parties involved, labour, government, and employers, and in addition it endured, from almost all parties, the sense that PEL, exciting and contentious as it was, remained an idea that would have to wait for better times. In short, there was a sense, not confined to Canada, since it was equally evident in Australia and other industrial countries, that PEL was a luxury, an ingredient of healthy if not

booming economies. The idea seemed to languish and to await the kiss of the prince of restored economic vitality.

However, the appearance was deceiving. The following review of ten countries, Australia, Belgium, France, West Germany, Italy, Japan, Portugal, Spain, Sweden and the United Kingdom, indicates that over the period the Report was being completed, and in the subsequent four years, there has been steady development of the utilization of PEL: not spectacular, except perhaps in the case of Italy, but steady. In addition, there is little or no evidence of serious retreat from gains made by the beginning of this decade.

All of the countries face similar challenges: technological change of immense proportions; declining birth rates in varying degrees; high unemployment and undereducated workforces; increasing international competition; and the need to distribute wealth more evenly in the world, if only to ensure the existence of markets for their products. At the same time, most of these countries have accepted, indeed welcomed, a rate of change which an educational system confined to the young cannot cope with, and similarly accepted the reality of a far greater learning capacity among their citizens of all ages than was thought to be the case, or than was even previously needed. What now appears to be a matter of growing speculation internationally is that PEL, rather than being a luxury that must await economic recovery, is, in its multitude of forms, a necessity, without which recovery may not take place.

The purpose of this paper, therefore, is to explore, to the extent that information is available, the developments that have taken place with respect to PEL in a variety of industrial countries over

the past decade.

The presentation will be divided into the following sections: purposes; mechanisms; locations; participation (rates and characteristics); strengths and weaknesses; the effect of current economic circumstances; and a summary of the most significant changes.

It is, however, necessary to enter a caveat about the information upon which this report is based. Anyone familiar with the education of adults in any society is aware of the great difficulty of detecting and describing its totality. In contrast to the education of the young, which takes place in buildings precisely designed for its purposes, at public and predictable times, adult education is ubiquitous, itinerant and shy. Even the most advanced countries, and Canada is no exception, provide only limited statistical information on a regular basis. The absence of accurate information on employer-sponsored education or training is notorious the world over, particularly because of the imputed extent, financial and participative, of such activities in all countries. Therefore, the bulk of sources from which information for this presentation is drawn are either especially designed and undertaken studies, such as Luttringer and Pasquier, "Paid Educational Leave in Five European Countries" (1980) or O'Malley, "Paid Educational Leave in Australia, Canada, Ireland, United Kingdom" (1982), or scattered reports from other organizations and from various countries. The problem of information, that is, the lack of it, is both cause and effect of the problem of definition. For example, Luttringer and Pasquier state:

In this article we shall confine ourselves to just one aspect of the definition, namely paid educational leave in the sense of an individual right entitling any employee to attend a freely chosen course on the employer's time without prejudice to his job security. . . . In practical terms a

broader definition would involve us in a discussion of every aspect of employers' training policies, which would be too vast a canvas for an article such as this. . . . We shall also leave aside trade union education since its aims, organizations and methods of financing are as a rule the subject of specific provisions in legislation and collective agreements. (p. 407)

However, even within these limits, which attempt to conform to the official definition of the International Labour Organization, when dealing with France, the authors are obliged to conclude:

In practice then there are two types of training leave, one with pay and the other without. In addition there are other types of leave: workers' education leave for trade union activities, leave for training the officials of youth organizations, and teaching leave enabling employees to take time off work to carry out training functions. (p. 410)

The point here is that the limited definition chosen by the authors, on the one hand excludes two of the largest programs of educational leave in most of the countries represented, and on the other, as the authors point out, cannot be applied rigorously to at least one country without distorting the realities beyond reason. The lack of a firm definition, and there is hardly reason to expect that one would have emerged so soon, means that information regarding absence from the workplace on a temporary basis for educational purposes comes from many sources, and under many headings, and is gathered and reported in order to serve a great variety of purposes. We can, with almost complete assurance, conclude that almost all of the available information underestimates the degree to which the practice occurs in almost every country about which some information is available.

The following list presents the countries about which some specific reference to educational leave has been reported, either in English or in French, in the past decade. In some cases, such as

Portugal and Spain, references have been minimal, usually inferential with respect to the necessary part that PEL must play in the development of Recurrent Education (see Jourdan, 1981). Others are represented by detailed studies of the kind already mentioned. The fact that the reports come from various sources, with various assorted purposes, is further indication of the emerging differences in definition and in concept.

Table 1

Countries Figuring in Reports on Paid Educational Leave
in Previous Ten Years

Australia
Belgium
France
West Germany
Ireland
Italy
Japan
Yugoslavia
New Zealand
Portugal
Spain
Sweden
United Kingdom
Switzerland
Algeria
Netherlands
Cuba

In 1974, the International Labour Organization adopted a general recommendation and convention on PEL that specified that each member country:

. . . should formulate and apply a policy designed to promote by methods appropriate to national conditions and practice and by stages as necessary, the granting of paid educational leave for the purpose of: (a) training at any level; (b) general, social and civic education; (c) trade union education. (Adams et al., 1979, p. 2)

PEL was defined as "leave granted to a worker for educational purposes for a specific period during working hours, with adequate financial entitlements" (Adams et al., 1979, p. 3). The interpretation that has arisen from this commitment has been that the leave should be used for a program of study of the employee's choice, and by further inference, that the studies ought to lead to the cultural and social development of the individual employee, rather than being composed of vocational education of a narrow and limited kind, that mainly serve the interests of the employer. It is frequently implied that these characteristics or conditions are related; that the existence of one either depends upon or leads to another. That is, that educational leave initiated by the individual employee will lead to a program of independently chosen studies of general benefit to the employee as an individual. Except, under infrequent circumstances, there is little evidence to support the argument for interdependence. In every country explored, the use by individuals of the opportunity for initiation of any sort of program of study is well below the number of those entitled to do so. Where agencies of the State play extensive roles in granting permission, allocating individuals to programs and making decisions about financial support for individuals, as is the case in France and Belgium, the overwhelming use of the opportunities have been for vocational purposes, despite efforts in France to

strengthen the freedom of individuals to initiate their own programs. Where collective bargaining has been the principal or sole source of the establishment of educational leave, such as in Germany, the United Kingdom and Canada, the majority of programs have been devoted to the development of competent officers of trade unions, a brand of management training for labour organizations. The single exception to this pattern is Italy. In all countries, the overwhelming reason for individuals to be absent from the workplace for purposes of specific learning during the period under scrutiny was in order to pursue programs of an almost infinite variety provided by the employer. "In 1977 for example [in France] only 60,000 people took advantage of [legislation enabling PEL] whereas in the same year, 1,700,000 attended courses organized by the undertakings" (Luttringer & Pasquier, 1980, p. 409).

While there is much to recommend the increasing freedom of choice of individuals with respect to use of paid leave for study, and while a great deal of the literature is devoted to describing situations in which more freedom of that nature is emerging, for example France, Germany, Italy and Sweden, nevertheless in terms of the great variety of patterns of such leave, and the variety of purposes to be served in the evolution of such programs, it seems self-defeating to cast the descriptive net short of the broadest possible range of activities. The argument regarding differential benefit arising from whether the program is employee- or employer-initiated is accepted without question, but does not seem to be a sufficient reason for excluding from these considerations employer-sponsored programs. Absolute distinctions between various degrees of freedom to choose on the part of employers or employees are quite impossible to maintain and, in the case of Japan, with its now

"fabled" conjunction of employer and employee interest over a wide range of issues, the distinction becomes almost meaningless.

A second tendency of many reporters and analysts is to exclude apprenticeship programs from most examinations. The usual reasons given are that they are too large in scope or already too well known to merit inclusion in the enquiry. Nevertheless, while apprenticeship programs have in recent years attracted substantial variations in support as the main or only vehicles for entering the workforce in the countries under examination, and have been very little utilized as a means of retraining, they still represent an example of time away from a workplace for educational purposes. What is more important is they represent the first experience for many individuals with a brand of educational leave--that is, the planned alternation of work and education. They may in future, therefore, exert enormous influence with respect to the effect of that first encounter on the individual's future utilization of opportunities for PEL during the rest of his or her life. So long as we know that absence from the workplace involves the cycles and circumstances generally associated with apprenticeship programs, such as supervision by a journeyman, graduated pay scales, mixed sources of financial support, etc., then we can estimate the value and function of that particular kind of PEL.

Two additional issues relate to the length of time that ought to be involved in "proper" PEL, and to whether training and educational programs for the unemployed may not also be included in any consideration of PEL.

The thrust of the PEL "movement" in all of the countries considered has been toward securing "longer" periods of leave for individuals. Krajnc (1981) argues that there seems to be a

qualitative difference in the learning resulting from brief repeated exposures to learning opportunities, usually associated with part-time education, and longer periods of total devotion to the same pursuit. It has long been accepted amongst learning theorists that some things are learned better by means of brief repeated exposures with intervals for practice and assimilation, and some by means of exposure to prolonged and cumulative periods of time; the difference, for example, between three hours a night each week, and a residential weekend from Friday to Sunday. While evidence is not clear with respect to long periods of concurrent or consecutive exposure, it is certainly clear in terms of the learning potential of exposure for one hour a day for three days compared to three concentrated hours a week. Nevertheless, it is necessary to acknowledge the realities in all the countries considered. While longer and longer periods are being sought, for example in Italy, France and Sweden, the shorter period of one to three weeks prevails and looks as though it would constitute the largest proportion of the use of PEL for some time to come. It would be unwise to eliminate shorter leaves of one to three weeks from our considerations. In fact, Sweden uses a short leave of two to three days' duration deliberately, to provide an initial experience of educational leave to individuals who do not understand its purpose or value, and who might never believe that it applied to them. It is quite clear that individuals have to learn how to learn under specific circumstances, at specific times in their lives, and with respect to specific motivations. The Swedish argument would seem to be that you have to learn how to use PEL, and what is needed to do that successfully is a brief, flexible experience with it.

Until recently, PEL excluded the unemployed, being concerned only with educational leave that guaranteed no loss of employment or benefits for the individual. Concern for the expansion of the practice, in almost all countries, has come from those agencies preoccupied with employment and development, industrial and individual, to whom, perhaps, the idea of "planned unemployment, individual and collective, associated with education and training" is an anathema. With the possible exception of Japan, where training and education is deliberately linked, publicly, with employment, concern for the unemployed has been located in other agencies, which, despite the very large training and educational programs they provide, have tended to see their work as remedial rather than developmental. Clearly the ILO convention does not include the unemployed.

However, as practices have developed and diversified with respect to the use of various forms of educational leave, more attention has been devoted to considering the two policy areas in one. In "Alternation Between Work and Education: A Study of Educational Leave of Absence at Enterprise Level" (CERI, OECD, 1979), the title of which clearly reflects the increasing diversification in types of educational leave, the authors state:

One preliminary point that needs to be cleared up is whether or not the leave entails subsequent return to the same enterprise. Strictly speaking, the term "leave" implies that the beneficiary will indeed take up employment with the same enterprise once his period of leave is over, and indeed, this is often a serious bargaining point since workers' representatives are generally concerned to maintain both security and seniority rights. However, a scheme based on common funding, attributing a general right to leave and aiming at the promotion of labour mobility and flexibility may well envisage that many of its participants will change jobs and may in fact recognize and encourage this by combining the educational provision with counselling and placement services. In other words the "leave" is from employment rather than from a specific enterprise. The distinction between this and the unemployed who regain employment following a training period is that those participating in these educational leave schemes do so voluntarily and as a reasonable planned move rather than as a consequence of events beyond their control. (p. 9)

While the report itself restricts itself to the consideration of the more conventional forms of leave, the door is clearly opened to including changing employers as well as changing oneself as one variety of "educational leave."

If we include apprenticeship programs within the concept of educational leave, which can be described as "work" reaching into the school for its purposes, then it will be quite logical, in fact necessary, in the future to include the extremely rapidly growing "cooperative" education programs, which can be described as "school" reaching into the workplace for its purposes. Eventually it may be impossible to tell the difference between these latter two, in terms of the procedures involved. Each will involve some form of absence from the "work" place for the purposes of specific learning.

Any preliminary examination of educational leave in the countries in question during the past decade indicates a steady growth in practices which have some similarity, but which are utilized in a wide and increasing range of combinations. The relative simplicity of the ILO convention can be retained as an ideal form of PEL, to be aimed at in all humane and rational societies, but it cannot be used alone as a means of describing what has been taking place. What seems more reasonable and useful is to provide cumulative sets of conditions, starting with the most inclusive, temporary absence from a workplace, and concluding with the less frequently accompanying conditions in the period under scrutiny, for example, two or more years. We can then deal with the fact that various combinations exist simultaneously in different societies, and despite a certain inclination for simplicity and tidiness among government officials, indeed all managers, the simultaneity of different combinations will continue to exist and the varieties will grow depending upon particular purposes and

circumstances. Arguments can be advanced that this complexity is to be preferred in so serious a human undertaking as the management of learning.

The following "cumulative" definition, therefore, will form the basis of further description and analysis.

1. [Temporary] leave from the workplace without loss of position, status or benefits.

We have bracketed "temporary" since we wish to extend the concept to providing for the unemployed, which means in our sense (see CERI, OECD, 1979; Emmerij, 1982) the "voluntary" use of leave for the purpose of changing employers rather than jobs. We also segregate this basic element, since it is likely that the developing patterns of employment in Canada will necessitate the extension of the labour standard to leave not necessarily associated with education or training. For example, Australia has legislated the access to relatively generous "long-service leave" which has not to date been basically associated with educational objectives, though it may have been used for that purpose, and may increase in that use.

2. For educational and/or training purposes.
3. Guaranteed by legislation.
4. To attend a program of the individual's choice financed entirely by the individual.
5. To attend a program of the individual's choice financed entirely by a public body.
6. To attend a program of the individual's choice financed by the employer and a public body.

7. To attend a program chosen by the employer, provided by the employer, and financed by the employer.
8. To attend a program negotiated with the employer, provided by another body, and financed by the employer, a public body, the individual, or some combination of all three.
9. To attend a program sponsored by a labour organization, provided by the labour organization, and financed by means of collective bargaining, public funds or a combination of both.
10. For more than three days and less than a year.
11. For more than a year.

The present ideal would seem to be a combination of 1-2-3-5-6-10 (11). The most common form to be found would appear to be 1-2-7-10. All other forms would appear to fall somewhere between these two.

Purposes

The evolution of practices of PEL in each of the countries considered, while under such similar pressures as the challenge of the ILO, and common industrial problems, has been characteristic of the particular state and history of each country involved. Nevertheless, common purposes can be detected, though they are often stated in quite different ways. For example, in Sweden:

The principal object of educational leave is to promote equality of opportunity; it should enable those who have not had the benefit of adequate initial general education or vocational training to complete their education at the secondary or higher level and to improve their skills. It should also help wage earners to exercise the powers granted them in the undertaking within the context of industrial democracy; whether or not they perform the function of staff or trade union representatives all should have the opportunity of improving their knowledge of economics, management, working conditions and work organization. Finally it should ensure the development of genuine lifelong education and enable everyone to participate in social and political life. (Luttringer & Pasquier, 1980, p. 411)

In France,

The accord set forth joint responsibilities [between industry and labour] for developing and participating in vocational training programs; to permit each worker to increase his knowledge and skills in relation to his own aspirations and perspectives on employment; to give firms the incentive to develop training policies compatible with their needs and potentials, and to give labour organizations the possibility of contributing to the development and functioning of training institutions which fill individual and collective needs. . . . One of the primary purposes of "Formation Continue" was to make the highly structured, traditional educational system more flexible and more responsive to current demands. (Sparrow, 1980, p. 45)

The purposes as stated by all the countries under consideration fall between two poles of objectives expressive of individual concerns and those expressing collective concerns usually of an economic or industrial character. What is at stake in all is the reconciliation of educational and labour policies, and PEL is significantly seen as the key to that reconciliation. The significance is that such phrases as "equality of opportunity" and "knowledge and skills in relation to his own aspirations," heretofore familiar enough in the literature of education devoted to the young, are now being applied to adults. What all countries share is the growing realization of the learning potential of their adult citizens, and of their growing dependence upon it. PEL is perceived as the critical link between the need for new abilities, new techniques, and new knowledge, and the means of persuading, of nourishing the willingness of adult citizens to acquire them.

However, the implementation of these purposes varies from country to country. Table 2, The Foundations of PEL, is revealing in terms of the degree to which the various countries have developed the use of PEL in the interests of specific objectives. The universal existence of employer-sponsored programs (1-2-7-10(11)) indicates the dominant form of PEL, and the history of the development of planned intervention into normal working life for educational purposes. As

early as 1927, Marks and Spenser, a huge retailing empire in the United Kingdom, opened its first training centre. By the early 1930s, all of the large oil companies in the world had initiated training programs of various kinds. Training must follow planned innovation or research, as night follows day. Any country with large-scale industry by the mid-1930s had experienced industrial and commercial PEL on a substantial scale. It involved almost all of the characteristics to be found today: long-term and short-term, purely technical-vocational to managerial-cultural, in-house and at external agencies. Nevertheless, it was dominated by the employer's wishes and interests, and established firmly the perennial issue of whose interests are being served, perennial because the answer to the question is not simple. Learning is an individual matter, and cannot be coerced.

Table 2

The Foundations of PEL

	1	2	3	4	5	6	7
	Legislation Universal	Legislation Selective (Age)	Legislation Selective (Occupation)	Collective Agreements	Employer Sponsored	Occupational Health & Safety	Financial Support Separately Provided
Australia		X	X	X	X	X	X
Belgium		X			X		X
France	X		X	X	X		X
West Germany	States	X	X	X	X		
Italy		X		X	X		
Japan		X		X	X		
Portugal		X		X	X		
Spain				X	X		
Sweden	X			X	X		X
United Kingdom		X	X	X	X	X	X

In Japan, "In 1955 training centers were operated in only about 20 per cent of the largest firms--of 5000 employees or more--but by 1970 a company center was available in about 80 per cent of similar firms" (van Helvoort, 1979, p. 73). Even with a late start, Japan learned quickly.

The next largest group is of PEL programs arising out of collective agreements. In Germany,

The number of collective agreements containing clauses relating to educational leave is rising: 204 collective agreements covering 2.8 out of 200 million employees make provision for leave for vocational training and trade union or civil education. The duration of such leave is generally short (one to three weeks). In about half the cases the employer continues to pay the trainees' remuneration. (Luttringer & Pasquier, 1980, p. 410)

While the bulk of this education is for trade union purposes, in most countries, the trade unions can and do provide opportunities for more broadly conceived civic education. The most interesting and radical of the trade-unions-based programs is to be found in Italy. In this case, workers are allowed, under the "150 hours agreement," to pursue formal schooling and to advance to secondary education, a level most of them have not achieved. Belgium's commitment to comparable opportunities for workers by means of PEL is reflected in column two of Table 2 which indicates those countries where a legislative basis, rather than a negotiated one has some age limits embedded in it, limits which favour younger workers. However, even in this case, age limits have been rising steadily as more and more countries come to realize that the desired rate of occupational change cannot be brought about only by training new entrants to the labour force. Included also in this column are formal programs of apprenticeship. Column three represents those programs accessible to particular occupations, by far the largest of which are positions in labour organizations. Column one,

representing those countries which would appear to have come closest to the objectives of the ILO, and indeed the PEL movement, must be considered in the light of column seven, for in every case the legislated right to leave does not automatically carry within it the right to be paid during the leave. Thus the intended universality is modified in the practice of granting such financial support.

The practice of paid educational leave is determined by the way it is financed. . . . The provisions in legislation and collective agreements on paid educational leave are very general in scope and cover all citizens and all workers. However the economic and budgetary constraints in each country are such that the priorities established by the authorities and the employers and the workers organisations are clearly reflected in the methods of financing. In France for example, since 1978, when individual freedom to select was strengthened, out of all state approved courses, 90 per cent are vocational training courses, 75 per cent are addressed to skilled manual and non-manual workers whereas these two categories represent only 47 per cent of the economically active population; 75 per cent last more than 500 hours, and 50 per cent lead to a state-recognised diploma. (Luttringer & Pasquier, 1980, pp. 418-419)

Similar limits can be found in all countries, and they are not necessarily predictable on the basis of the predominant foundations. For example, in Italy, while participation in formal schooling can be seen as a limit, its foundations lie in negotiated agreements leading to state participation.

Finally, column six is included in Table 2 to reflect a relatively recent foundation for PEL, which in most of the countries is based on more than one of the other foundations, occupational health and safety. It represents a new basis for combined interests of workers, employers and the state in the use of PEL on a very large scale. It may be that this concern or concerns, particularly in those countries where long-term employment is common, if not the norm as in Japan, will prove to be the most relentless and enduring foundation of all.

Table 3 provides indication of the dominant kinds of education/training to which PEL is devoted in the countries examined. It is likely that all of the areas of study can be found in all of the countries, and what is presented here are only the dominant ones. Nevertheless, they are the engines presently driving the move toward the expansion of PEL in each of those countries.

Table 3
Purposes

	1 Formal Educational Upgrading Certificate	2 Formal Vocational Training Certificate	3 Vocational Training	4 Labour (Political) Education	5 General Cultural Education
Australia				X	
Belgium	X				
France		X	X	X	X
West Germany		X		X	
Italy	X	X		X	
Japan			X	X	
Portugal	X		X		
Spain	X		X		
Sweden				X	X
United Kingdom		X	X	X	

In most of the countries, there appears to be an awareness that PEL is both means and end. Its goals, individual and collective, are attractive and desirable, but so are the means of reaching them, that is, the chance to engage in systematic learning. The willingness to learn must be won, over and over, and the goals, long and short term, must be both attractive and intelligible to the learner. Learning is a powerful force to stimulate and to release in any society, but every society knows that there is no alternative. They also know the time necessary to accomplish that learning, for each individual learner, must be available, and that PEL is a crucial pivot for joining individual learning and its economic, social and cultural objectives. In addition to that, they are coming to realize that time by itself is not enough.

Mechanisms

Mechanisms for the operation of schemes of PEL fall roughly into two categories--three if we include the vehicles by which courses or educational programs are delivered instead of making it a separate section. The two that are included here are:

1. the means by which leave for educational purposes is achieved by or granted to individuals
2. the means by which "wages" during the leave are provided.

It is worth repeating the significance of the separation between these two categories, since it is the latter category that is most clearly and frequently used as a means of controlling the frequency of use, and the objectives that will be pursued. This distinction is most clear in those countries (France, Belgium and Sweden) where access to PEL is a legally guaranteed right for individuals. It seems

reasonable to conclude that the more universally guaranteed the right to leave, the more complex and highly regulated is access to remuneration during that leave.

Table 4 indicates the variety of mechanisms in place for the management of granting leave to individuals. The similarity of the total mix of procedures in all countries investigated is perhaps not surprising. They are all industrial countries to varying degrees, and all possess comparable if not similar agencies: states, employers, trade unions, and public and private educational agencies. In an intervention as fundamental as PEL, we should not be surprised that all of them are, to varying degrees, involved. Again we must stress that the problems of obtaining reliable and inclusive information probably result in an understatement with respect to the existence of various mechanisms. It is likely that all of these mechanisms could be found in every country, and it is equally likely that all of them will continue to exist. Like all of adult education, everywhere, the means of providing it are not simple.

Table 4

Mechanisms for Obtaining Time

	1	2	3	4	5	6
	Agency	Agreement	Groups	Multi- Committee	Mature Employee Time & Finance	Employers
Australia	X	X	X		X	X
Belgium	X	X	X		X	X
France	X	X	X	X	X	X
West Germany	X	X	X		X	X
Italy		X			X	X
Japan	X		X			X
Portugal						X
Spain	X		X			X
Sweden	X			X		X
United Kingdom	X		X	X	X	X

Therefore, what are reported are the dominant mechanisms in each country, and what vary are the dominant combinations of them in use. For example, France depends heavily on the use of state agencies for the granting and controlling of the leave, while West Germany relies more heavily on mechanisms arising from collective bargaining and the implied relationships between trade unions and employers. Nevertheless, there are four Länder in West Germany who have provided legislation granting rights to leave, and to that extent state agencies are involved. Sweden, with the most extensive commitment to legislated rights, uses a complex network of "multi-partite" committees involving trade unions, employers, educational agencies and local authorities. Japan has intervened legislatively on behalf of large and small employers, though the bulk of the mechanisms are concentrated among the large employers and employer groups. If we were to include state educational agencies in Table 4, then of course, every cell in column one would be filled, since in every case public educational bodies are involved to some degree. This is particularly true in Sweden, Belgium, Italy and the United Kingdom, where there is a very close link between the provision of educational leave and the pursuit of formal educational credentials supplied by public bodies. Column five is included in order to reinforce the preceding argument that a simple notion of PEL, such as that reflected in the ILO convention, will not suffice as a descriptor for the varieties of absences from work for educational purposes to be found. In Belgium, France, Italy and the United Kingdom, there are provisions for the contribution of employees, that is, of leave-takers, of their time or money or both. As the individual choice of study moves farther away from "pure" vocational study, the likelihood of employee contributions increases.

Table 5

Mechanisms for Obtaining Lost Wages

	1	2	3	4	5	6	7
	State Levy on Employers	State Levy on Employers & State Contribs.	Employers Alone	State Alone	Trade Unions	Some Employee Contribs.	State Grants & Loans
Australia			X	X	X		
Belgium	X	X	X		X	X	
France	X	X	X	X			
West Germany	X	X	X	X		X	
Italy			X			X	
Japan			X	X			
Portugal			X	X	X		
Spain			X	X			
Sweden	X		X	X		X	X
United Kingdom	X		X	X			

The second group of mechanisms are those for obtaining financial support or "lost wages" (Table 5). Next to the employer as the principal source is the levy placed on the employer by the state. Five of the countries in question, Belgium, France, Sweden, West Germany and the United Kingdom, use this particular device, though in West Germany it is a matter of the employer simply paying the employee the wages that would have been lost on leave, rather than a matter of a direct levy. There is some argument that the simple levy gives the individual more freedom in the choice of study, since there is some distance between the predominantly vocational interests of the employer and the payment to the leave-taker. The employer appears to be as dominant in France as in Germany, but there does seem to be a wider range of choice open to the employee in France. Four countries (Belgium, West Germany, Italy and Sweden) demand some contribution from the employee. In most cases, this is related to an "earned" factor, in the sense that as the employee persists and succeeds in the program, the official assistance becomes greater. In Belgium,

If he has successfully completed at least two years of social advancement instruction, in the third year he may take time off work for the same number of hours as there are hours of study. If he is only in the second year of studies he is entitled to half that number, while workers attending such courses for the first time qualify for paid leave equal to one-quarter of the total study time required. (Luttringer & Pasquier, 1980, p. 408)

Of special interest is the Swedish program, where a combination of grants and loans is in use. The similarity between this mechanism and those used for the support of more conventional students in many of the countries in question supports the notion that there is a growing convergence in the financing of all "voluntary" students, regardless of their age and other economic or domestic circumstances. This is particularly evident in Australia, where an official recommendation was to provide for PEL by means of ordinary educational financing

instead of introducing a levy on employers. Here, as in other categories, Spain and Portugal are the least developed countries with respect to the variety and sophistication of the mechanisms in use.

Principal Locations for Training

Employers [in France] both in firms and in employer associations, play a leading role. Employers may fulfill their obligation in one or more of the following ways: they may organize training in the firm, finance training by contracting with an outside institution; contribute to a joint employer-union training fund; make payment to an approved training institution, or make payment to the treasury. (Sparrow, 1980, p. 45)

Table 6 indicates that France, Australia and the United Kingdom appear to display the greatest variety in the use of locations for the utilization of PEL. All use various combinations of existing public educational agencies; public agencies especially created, such as the Skillcenters in Scotland; private commercial agencies, these most apparent in France in the last decade; employer-group provided centres; single employer provisions, and trade union centres. All other countries use various combinations with less dependence upon specially created public agencies, private commercial organizations, and trade union centres, though in the latter case one suspects that there is more use than is reported in the literature. In Japan, there is enormous dependence upon employer-group and employer provided centres, with only a minority making use of the publicly provided centres. The very heavy dependence upon publicly provided centres reported in all countries except Japan is partly a result of the dependence upon conventional apprenticeship programs, particularly in West Germany, and in the United Kingdom, where cooperation between industrial training and the public educational system has a long and solid tradition. In contrast, in France, the public agencies of education, particularly the universities and other post-secondary

agencies, were slow to respond to the movement for PEL. The years immediately following the passage of the first law guaranteeing rights and establishing the levy on the employers witnessed the appearance of a multitude of private agencies, commercial and employer groups. These developments presumably account for the fact that in both France and Italy, the "reform of the public educational system" in the sense of making it more democratic and accessible to all people of all ages, is one of the stated purposes of PEL.

Table 6

Principal Locations of Educational Programs

	1 Public Educational Agencies General	2 Public Educational Agencies Special	3 Private Agencies Commercial	4 Private Agencies Employer Groups	5 Employer In-House	6 Trade Union Centres
Australia	X		X	X	X	X
Belgium	X			X	X	
France	X	X	X	X	X	
West Germany	X			X	X	X
Italy	X			X	X	X
Japan	X			X	X	
Portugal	X			X	X	
Spain	X	X		X	X	
Sweden	X			X	X	X
United Kingdom	X	X		X	X	X

Since that time there are indications that public agencies in both countries have become more responsive. In Italy, despite the refusal of the government to provide greater access to longer courses for workers on PEL, some of the educational agencies have begun to provide such opportunities out of their own resources.

As in the case of financing and provision of leave, the means of providing educational resources for adults can and will never be simple or constant in composition. Voluntary students make inconstant and unpredictable choices about where and what to study, to the extent that legal and financial resources permit. While the exact pattern at any one time will be reflective of the historical experience of the society in question, it is likely that all countries will press towards a greater provision for PEL by public agencies. Declining birthrates in all of the countries examined have provided surplus capacity in those agencies, somewhat unevenly however. The fact that, with the exception of the employer-sponsored courses and programs, the principle of public finance for those programs is well established in most of the countries, suggests that public authorities will turn to existing agencies as the primary means to accomplish the job. Both Australia and the United Kingdom report a steady movement in that direction over the past decade, though the present government in the United Kingdom, believing that the employers should carry the greater share of all of the costs, has recently moved to reduce public expenditure in those areas. Even in Japan the government has been making more use of public agencies in order to provide for the employees of smaller employers--a problem that presents itself in all of the countries surveyed. The general discontent exhibited by employers with respect to the "practicality" of the training provided by conventional public educational agencies, may have had and may

continue to have some influence on the creation of special public agencies such as the Skillcenters in Scotland, or the provision of programs by employer groups. In addition, there are complaints to be found, notably in Portugal and Italy, of the failure of public agencies to adjust their practices, most notably their teaching practices to the needs of adults learning under the circumstances common to most types of PEL. Nevertheless, the perspective of a decade or more would suggest a steady drift to the conventional educational agencies, and perhaps to their eventual radical transformation.

Participation

Paid Educational Leave remains a marginal institution in the vast field of adult education. Compared with the number of workers trained by and in undertakings; of job seekers attending retraining courses; and of workers enrolled in evening classes, the annual number of workers taking paid educational leave is small: 30,000 in Italy, 20,000 in Belgium and 21,000 in France. In Sweden paid educational leave corresponded to 12,800 trainee years in 1978-79; in Belgium the special fund is even left with a surplus. (Luttringer & Pasquier, 1980, p. 422)

The conclusions reached by these authors are a result of applying a very narrow definition of PEL (1-4, 7-9; see pp. 12-13). When, as they acknowledge, the more predominant forms of PEL are included the picture becomes quite different. The report, however, engenders another sort of dismay with respect to the assessment of the extent of PEL anywhere, that related to the absence of reliable data. The application of different definitions, and the inadequacy of almost every country's statistical reporting of adult participation in education, with the possible exception of West Germany and Denmark, makes it virtually impossible to provide accurate estimates of the scope of the practice. It is a problem common to all of adult

education. Not only must one cope with the basic vagaries of individual adult choice, but also with the fact that providing agencies vary in their numbers, character, purposes, and longevity. The decade under consideration has been populated by an increasing variety of special types of legislation in all the countries considered, all of which are directed at problems associated with employment. Most involved training, the creation of special agencies and the provision of new and specialized incentives to participate in training, all of which have affected PEL. While this may seem to be merely a characteristic of the slow but steady growth of this phenomenon, experience with adult education overall would suggest that this sort of flux is normal and unavoidable, and that no future stability in any of these factors can be anticipated. Since it is impossible to overestimate the potential significance of the utilization of PEL in the "quality of life" in these societies, it is equally impossible to ignore the need for more vigorous, inclusive and detailed gathering and publishing of statistical and qualitative information about the utilization of PEL. In this case, Canada is no exception.

The result of these inadequacies and variations is that it is only possible to report "suggestive" information on participation of individuals in PEL, accepting the fact that it is inadequate for any detailed conclusions, and that for the most part it is not comparable from one country to another. In most cases it is not available even for the same year.

Australia (1979): perhaps one million (20.2%) employed workers received some form of paid educational leave. (O'Malley, 1982, p. 22)

Belgium (1974): 50% of all eligible workers received leave: 77% men, 44% women; 78% blue-collar, 58% white-collar; 80% big employers, 20% small employers. (Jain, 1978, p. 14)

France (1979): of those taking leave, 18.8% were unskilled; 45.7% skilled; 23.6% supervisors; 14.9% engineers and managers. (Sparrow, 1980, p. 49)

West Germany (1980): about 5% of eligible workers utilized the leave: users tend to be younger than average of workers; 65.95% men, 35.14% women; white-collar workers predominate two to one. (European Industrial Relations Review, 1973)

Italy (1980): participation rose from 14,237 (1974-75) to 89,997 (1976-77). (Risk & Crossman, 1979, p. 247).

United Kingdom (1978-79): over 39,000 unionists attended 3,035 courses approved by the TUC. These consisted of nearly 1,600 courses for over 20,000 workplace representatives and over 1,400 courses for 19,000 safety representatives. (O'Mallie, 1982, p. 68)

From this and other information, the overall patterns of participation appear to be:

- steady increase in use, though rate has dropped in most recent years
- more men than women
- generally more white-collar and skilled workers than any other groups
- general trend to shorter periods of leave, especially most recently
- participants are much more likely to come from large employers than from small ones
- in no country surveyed have the total number of workers eligible used the leave.

Some of the factors that may be affecting these patterns of participation will be provided in following sections on strengths and weaknesses of the various programs, and on estimated effects of prevailing economic circumstances. What is of immediate significance here is the degree to which the participation figures, such as they are, reveal a major contradiction in the development of programs of PEL.

On the one hand, the record of its development over the past decade, and more, reveals a formidable reluctance to make such leave too easily available to workers. The reluctance has been and continues to be displayed by employers, first and foremost, by government officials, and also by some groups of educators. Apart from the very mixed reaction to cost, and there are arguments on both sides of that issue, the reluctance seems based on the view that educational leave is without question preferable to work, perhaps implicit in this view is the belief that learning is easier than work, and that every worker presented with the opportunity will seize it. This last conviction presumably accounts for the nearly universal ceiling placed on the number of workers who may be on leave at any one time.

The contradiction is supplied by the evidence accumulated over the past decade that these limited opportunities have been available. There is no evidence of a concerted rush to use paid educational leave by those eligible. Everywhere the opportunities have been underutilized, to the extent that some countries have become concerned that the problems to which PEL is addressed are not being solved by means of the voluntary involvement of workers in PEL. In Sweden, for example, where the state is primarily concerned with equity, additional incentives have had to be provided, including a deliberate program of short leaves. Louis Emmerij of the Netherlands has recently proposed the use of PEL as the principal means of dealing with unemployment, and the injection of greater equity into that society (Emmerij, 1982). In this case, incentives in addition to the provision of time for study play a substantial role. Adult lives are adult lives in all of these societies. Most contain little or no provision, either in terms of individual expectations and values, or

of ordinary domestic circumstances, for prolonged absences from work and/or from home for purposes of study and education. This is particularly true in the case of women, in all of the countries examined. Whether they are employed away from home or work at home looking after their families, the adaptation of their circumstances to suit most of the available opportunities for PEL, even though income is maintained is simply impossible. In an experimental program in West Germany,

Two types of programs, one for initial and one for further training were then established; the hours of vocational training varying according to the past work experience of the trainee, for example 300 hours per year of combined theoretical and practical training for young or unskilled workers, as opposed to 220 per year for skilled workers with training and experience wishing to become skilled in an other field, as well as for those who had acquired partial skills, who had finished polytechnic secondary school or who had several years of successful work experience. For workers with long work experience (five to ten years), group courses and supervised self-study programs were provided ranging from 180 hours per year for initial training to 70 hours per year for further training. . . . After several years of an experimental period, this highly flexible system of vocational training for working women has had satisfactory results: the number of trained skilled women has doubled since the introduction of the aforementioned regulations on educational leave, and the willingness of women to acquire skills has thus undergone a substantial positive change. (Social and Labour Bulletin, 1975, pp. 338-339)

Again, we must conclude that time alone is not enough.

Strengths and Weaknesses

Ten years or more would seem a reasonable time to judge the tenacity of a practice, particularly when there had been considerable variety in economic and industrial-technical conditions during the period. At the same time, the decade of experience has presented some considerable variations on the simple theme of absence from the

workplace for the purpose of learning something, without undue or unnecessary sacrifice on the part of the individual concerned.

Without denying the pioneering effect of the ILO convention, as the practice has spread variations in rights, methods of payment, age of eligibility, objectives of study and duration of leave, have occurred, complicating our ability to assess the extent of the practice, but, undeniably enlarging its use by individual workers.

The question now is to acknowledge these variations as being within a general concept of educational leave, and try to examine their implications. In terms of the assessment of "strengths and weaknesses," it must be acknowledged that we are discussing a "cultural" phenomenon, similar perhaps to the now fashionable Japanese "quality circles" rather than simply a technical or economic one. For that reason, an assessment of strength or weakness must be qualified by the fact that in terms of the specific culture under examination, there may have been no alternative to the means utilized. For example, in the face of quite similar problems involving the need for assistance to "labour education," Australia created a separate educational agency to undertake the program, while Canada provided financial assistance directly to labour organizations as a means of accomplishing the same objective. Both actions involved indirect support of PEL for specific purposes. However, neither one would have been acceptable or sensible in the other country for a variety of cultural and historical reasons.

In this particular context, it would appear unreasonable to apply the ILO convention too literally to Japan, where the relationships between employer and employee, particularly those involving the

perception of mutual interests, which directly affects the individual will to learn, are different than those to be found in North America or Western Europe. Therefore, a first observation can be made that the character that the evolution of PEL displays in any country will reflect the history and culture of that country. It is a distinct possibility that the more it does reflect that culture, the stronger and more inclusive the movement will be.

We do not, however, have to accept total cultural relativism. The core of the definition--absence from the workplace, etc.--can be maintained and applied to various societies with a view to assessing the outcomes of particular combinations of mechanisms. The one unvarying criterion that can be applied, though so far only tentatively because of the absence of detailed information, is of the degree to which, in each country examined, the total number of those individuals entitled to PEL actually availed themselves of the opportunity. The answer would seem to be that in no country so far has the maximum been reached. The evidence reflects somewhat oddly therefore on the prevailing existence of ceilings on the number of participants at any one time. While we cannot tell if the ceilings in fact contributed to the discouragement of participants, what does seem evident is that they are not, or so far have not been, necessary in any of the places they exist. The fears that prompted them would seem to have been unfulfilled. Table 7 outlines the degree to which the various countries (1=least, 5=most) have utilized different mechanisms or circumstances in pursuing the extension of PEL.

Table 7
Strengths and Weaknesses

1	2	3	4	5	6	7	8	9
Multiple Auspices	Multiple Programs	Multiple Durations	Access to Formal Certification	Appropriate Educational Profiles	Coherent Labour-Educational Manpower Policies	Adequate Information and Preparation	Balance Between Large & Small Employers	Predominance of Individual Initiative
Australia	4	3	3	2	2	2	3	2
Belgium	3	4	5	3	4	3	2	4
France	5	5	3	3	4	4	2	4
West Germany	3	4	2	3	3	3	2	3
Italy	3	4	5	4	3	4	3	3
Japan	3	4	2	3	4	4	4	2
Portugal	2	3	4	2	2	2	?	?
Spain	3	3	2	4	3	3	?	?
Sweden	5	5	5	5	5	5	4	4
United Kingdom	5	5	5	4	5	4	3	3

Columns one to three indicate the degree to which countries have used more than one basis for the provision of leave, more than one type of educational program, and a variety of periods of time the leave-taker may have access to. There seems to be some consistency in the sense that a multiplicity in one column means a multiplicity in the others. Given the fact that multiplicity in column one ensures that a variety of motives and objectives are involved, it is not surprising that the others follow. While the multiplicity itself makes it difficult to ascertain total numbers of participants, one suspects that France, Sweden and the United Kingdom are near the top. It also appears (column six) that these countries are at or close to the top in successfully coordinating educational and manpower policies. According to available evidence, the least development in this respect appears to have occurred in Portugal.

The existence of coordinated policies and practices, particularly with respect to employment or manpower and education is evident in columns four and five, where the opportunity to secure formal certification and to find teaching and administrative practices suitable to adults is reflected. The latter two apparently do not necessarily go hand in hand. The French and Italian determination to use PEL as a means of reforming the educational system is seemingly an uphill struggle. However, Sweden, with a similar determination to transform its educational system into genuine "recurrent education," and with a long tradition of popular adult education, seems to be making faster progress with respect to these two variables.

One of the most difficult areas to assess and, according to all current literature on adult education, one of the most critical, is the availability and efficacy of adequate and functional information.

Perhaps it is because we are so conditioned by habits derived from educational systems which are either compulsory or uninterrupted or both, that we continuously underestimate the urgency of the matter of information. We are frequently naive in the extreme about how quickly or uniformly information spreads through our societies. It would appear from the evidence assembled that we are also naive about the values, hopes, aspirations and experiences with education in particular through which the information will be filtered.

At the same time we know that all adults do not have the same opportunities to utilize the courses given in adult education. There are important hindrances, such as: the lack of motivating social background, low self-respect due to weak educational background and/or bad results in early schooling, poor finances, heavy family obligations, and, of course, the individual's ability for learning plays an important role. A lot of adults have also found the education available to be incompatible with their situation and interests. (Dalin, 1981, p. 230)

This factor, more than any other, may be the decisive one with respect to the failure of all those eligible to seize the opportunity. There can be no doubt that these circumstances have a great deal to do with the predominant participation by skilled and white-collar workers in every country but Belgium. Sweden, with its interest in equity, has faced this problem the most directly, making the provision of information a legal responsibility of all parties, and by instituting short leaves which will provide an opportunity for those with the least educational experience and confidence. The experimental program in West Germany, previously referred to, would seem to provide impressive evidence of the need for such measures. It may be also that the union basis for the Italian program and its startling success compared to the state-provided opportunities, means that a "membership" network not only assists the flow of information, but provides some of the mutual confidence necessary for involvement.

The largest difficulty would seem to be that of involving small employers (column eight). Japan has intervened with legislation on their behalf, but there is no clear evidence as to whether it is working. The problem is quite clear: the smaller the enterprise, the greater the difficulty in releasing a worker.

It may also be true that, until the present time, the vast majority of small employers were engaged in enterprises where training was not perceived to be of great importance, and most workers were easily replaceable. This meant that most workers in the area did not participate in the largest category of leave, employer sponsored, and even despite the existence of a legal right to more general education, there was little opportunity for them to participate. All of the usual difficulties, the absence of information, the lack of opportunity for promotion upon return, and the lack of supportive educational experience, are presumably intensified with the employee in a small enterprise. Australia has experimented with groups of small employers and pooled resources with modest success. Small employers in remote areas present even more severe difficulties. It is likely that only a more general system which mixes the concept of PEL with changing employers will do much to deal with this problem. However, since the evidence from France, Belgium and Sweden indicates that some employees from small enterprises do participate, further investigation into their circumstances may be revealing.

There is a variety of experience with the imposition of a levy on the employer. The foremost country in this respect appears to be France, with comparable schemes existing in Belgium, the United Kingdom and Sweden. The argument that it equalizes the competitive disadvantages of investing in training and education is very appealing, as is the fact that under these schemes employees seem to

experience greater freedom in choosing their type of study. However, the levy scheme does seem accompanied, with the possible exception of Sweden, by problems of information and motivation on the part of employees. On the other hand, the negotiated arrangement in Italy and Germany place the labour organizations and their influence over their members in league with the goals of PEL. This seems notably the case in Italy. However, they in turn seem restricted to large organizations or groups of organizations. Returning to France, it seems to have been important in that country that a degree of accord had been reached between the major employer and employee organizations regarding PEL before the legislation was enacted.

If column nine averaged one, we would simply refuse to believe it. Only individuals learn, and they must wish to do so. Specific learning on the part of individuals cannot be coerced. Therefore, in all particular types of PEL in use in any country, where the learning objectives are achieved to some reasonable degree, the circumstances must be such that the individual wished to participate. That will be the case whether the invitation comes from the employer, or whether it is a legislated right. The fact that even where the right is legislated, the vast majority choose vocational programs, suggests that there can be a large coincidence of interest between employers and employees. Nevertheless, the pursuit of the maximum freedom of the individual to choose, to have the maximum control over the utilization of PEL, would seem to support what is known about learning, and what is known about the advantages to society and the individual of the maximum of individual freedom, and long and short run. For those with the opportunity, ambition and confidence to utilize PEL, it is likely that their commitment to the society that encourages them to do so, by right, will be enhanced. For those

without all of those circumstances, the right in association with other supporting mechanisms will encourage their likelihood of doing so. There is so far no evidence to be found of excess or abuse.

The variety of parties involved, the mixture of types of decisions to be made, individual and collective, and the procedures to be followed, suggest that the maximum advantage would follow from a system of legislated individual right to PEL, combined with a variety of means of financing the leave operating simultaneously. This would allow the maximum of individual freedom to determine objectives and seek support, and the ease of intervention by various collectivities in pursuit of particular social objectives. This appears to be the model to which most of the countries examined are moving, though they are approaching from different directions, and progressing at highly varying rates of speed.

In assessing the impact of the economic problems of the past five years on the utilization of PEL, it is really a matter of whether the glass is half empty or half full. On the one hand, one could argue that these circumstances should have enormously encouraged the use of PEL, for handling redundancy, for dealing with technological change and the need for retraining, and perhaps for encouraging individual development by means of trading some immediate material well-being for such development. Available evidence, except in the case of Japan, will not support that this happened. By and large, the movement toward universality seems to have slowed in most of the countries, and participation seems to have done the same. Individual workers have been less confident about being away from their jobs for extended periods of time, preferring, at least in France, to reduce the duration of their leaves. Some disappointment with the absence of any development in their work, in contrast to the successful development

in themselves, has apparently also led to some discouragement. The rate of increase in the use of PEL by employers and employees alike seems to have declined in the period in question.

However, that seems to be all that has happened, and it has not happened evenly across all countries or within them. In Italy, pressure is being applied for longer leaves and access to longer programs, and increasingly cooperative educational agencies seem prepared to experiment with them. In no other country has there been indication of regressing from the support that the Adams' Commission Report concluded existed in their five countries in 1971. And in some countries, for example Sweden, there are examples of intervention by the state on behalf of selected groups, in terms of providing greater incentives for them to avail themselves of some form of PEL.

Conclusion

The past decade has witnessed the slow and steady growth of PEL in the ten countries surveyed, though information about Spain and Portugal is scarce. At the same time, the concept of what such leave constitutes beyond the three basic conditions of absence from the workplace, for educational purposes, at no exorbitant cost to the individual, has broadened and grown steadily more complex. A great variety of patterns have developed, exist, and exist simultaneously in all of the societies examined. There is no indication at present that this complexity will decline or that one single dominant pattern affecting all of the related circumstances will emerge. What is clear is that no society appears to have yet developed a satisfactory way of measuring the extent of participation in PEL, its real cost, or its immediate or long-term effects on the individuals involved or the

society as a whole. While the absence of such procedures has not constituted a reason for not proceeding with the implementation of such activities as those involved in PEL, the growth in that implementation insists on the need to develop the means of systematic assessment as soon as possible. The existence of such means could assist immeasurably in the more effective implementation of PEL.

Nevertheless, if the experience of the ten countries examined is to be accepted as exemplary, then there is no longer a need to debate the value of some form or forms of PEL for the entire population of any country. It exists in all the ten countries examined, and it exists on an increasing scale. It is increasing in two senses: first, that more and more individuals of those groups primarily entitled to PEL are making use of the opportunity, and second, that more marginal groups, such as homemakers and the unemployed, are being included. What is crystal clear is that behind the demands of justice, humanity and simple civility, for the right of each of us to utilize for our own development the capacity for learning that makes us most human and most civilized, lies the awareness of our collective existence, family, state, union, undertaking, etc., that we cannot survive in any manner familiar to us without utilizing, without releasing that capacity on our collective behalf.

The only argument necessary and relevant is one of means. How is that capacity to be released most effectively? Who shall participate, when and for how long? Who shall pay, and in what manner shall the obligation be allocated? And finally, to what ends will this time away from the workplace, the means by which individual growth can be encouraged, be directed, and who shall decide?

We should not treat this debate as one of mere technique. The countries surveyed present a wide range of patterns for the solution

of these problems. There is no single perfect pattern. All have grappled with the various combinations of interest that must be involved, including that of the individual who alone has the power to release the learning. Various combinations have been tried, discarded, and no doubt will be tried again at some future time, though it seems to be clear that the limiting conditions, such as age, once present in Belgium and in some other countries, have been discarded permanently.

In all examples the contradiction referred to earlier is to be found: on the one hand a somewhat grudging willingness to permit widespread access to PEI, and the implicit assumption that learning is easier than work, or that any form of PEL is preferable to remaining at work; on the other a decade of experience that does not bear out those assumptions, and that has necessitated the intervention of some governments by means of increased incentives and easier access to PEL for certain groups. The realization has grown that as important as it is, time alone is not enough, and rather than imposing limits, in some cases, it is necessary to do the opposite. Perhaps it is becoming clear that our collectivities must deserve the willingness of individuals to face the unknown personal future that all learning involves, a future that far exceeds a job, or a specific skill, or a salary, and reaches into who and what each of us will be tomorrow and the next day, after we have transformed ourselves by learning something we do not know, or cannot do or feel.

The political founders of the liberal democracies placed the ultimate political authority in the hands of the individual, the learner. Therefore, when we extend the opportunities and range of

individual learning we are facing the basic character of our society and the people in it. The debate over PEL, Skill Development Leave, and its other variants is perhaps the most promising debate, the most significant debate of the last of this century, perhaps of any century.

References

- Adams, R. J. Educational leave: North American development and design elements. Work Times, 1982, (Fall).
- Adams, Draper, & Ducharme. Education and working Canadians: Report of the commission of inquiry on educational leave and productivity. Ottawa: Labour Canada, 1979.
- Barnett, K. Alternating work and education: Use of leave schemes for educational purposes. Paris: OECD, an Educational Research and Development Committee Project, 1979.
- Booker, C. PEL courses for local union leaders. Canadian Labour, 1981, (March), 13-15.
- Bryant, I. Paid educational leave in Scotland. Scottish Journal of Adult Education, 1980, 5.
- CERI, Organization for Economic Cooperation and Development. Alternation between work and education: A study of educational leave of absence at enterprise level. Paris: CERI, OECD, 1978.
- Canadian Association for Adult Education. From the adult's point of view. Toronto: CAAE, 1982.
- Connaghan, C. J. The Japanese way: Contemporary Industrial Relations. Ottawa: Labour Canada, 1982.
- Coxon, J. Education: Examining paid education leave. The Labour Gazette, 1978, (November/December), 512.
- Dalin, A. The Norwegian Adult Education Act: A step towards recurrent education. Recurrent Education in Western Europe, 1981.
- Emmerij, L. Paid educational leave with particular emphasis on its financial aspects (discussion paper). The Hague: Institute of Social Studies, 1982.
- European Industrial Relations Review. West Germany: Study leave options. European Industrial Relations Review, 1980, (73).
- European Industrial Relations Review. New Educational Leave Act in Sweden. European Industrial Relations Review, 1975, 14, 11-31.
- Harvey, E. B. Barriers to employer-sponsored training programs in Ontario. Toronto: Ministry of Education, Ministry of Colleges and Universities, 1980.
- Industrial Relations Journal. Workers representation and the articulation of training needs. Industrial Relations Journal, 180, 11(2), 49.

- Industrial Relations News. Employees at GE who want to go back to school full time. . . . Industrial Relations News, 1981, 31(34), 3.
- Jain, H. C. Paid educational leave in Europe: Its implications for Canada. City: European Institute for Advanced Studies in Management, 1978.
- Jourdan, M. (Ed.). Recurrent education in Western Europe. Windsor, Berks, U.K.: NFER-Nelson Pub. Co., 1981.
- Krajnc, A. Educational leave in the framework of the Yugoslav adult education system. International Review of Education, 1981, 22(3).
- Litvak, I. A., & Maule, C. J. Educational leave in Canada: A look at individual programs. Monthly Labour Review, 1980.
- Luttringer, & Pasquier. Paid education leave in five European countries. International Labour Review, 1980, 119.
- O'Malley, I. Paid educational leave in Australia, Canada, Ireland, and United Kingdom. International Labour Review, 1982, 121.
- Perigoe, J. R. Educational leave: Does Canada want it? Canadian Personnel and Industrial Relations Journal, 1978, (October), 14.
- Peterson, R. E. Learning from adult education programs in foreign countries. Berkeley, Calif.: Educational Testing Service, 1980.
- Risk, & Crossman. The right to continuing education and the Italian initiative. Adult Education (London), 1979, 1.
- Rosenfeld, P. Training trade unionists for today and tomorrow. Personnel management, 1977, (June).
- Schtob, E. F., & Hackney, N. Social education: The district 1199 training and upgrading fund. New Directions for Experiential Learning, 1980, 10.
- Schuyff, J. Industrial training in Canada: Some observations. Labour Research Bulletin, 1980.
- Schuyff, J. The cost of employer-based training. Labour Research Bulletin, 1980, (July).
- Sinclair, V. Paid educational leave in New Zealand. Geneva: International Labour Organization, Conditions of Work and Life Branch, 1982.
- Social and Labour Bulletin. Algeria: Leave for educational and training purposes for workers in the private sector. Social and Labour Bulletin, 1975, (3), 337.

Social and Labour Bulletin. German Democratic Republic: Vocational training for women: Lessons of experience. Social and Labour Bulletin, 1975, (3), 338.

Social and Labour Bulletin. Norway: New system of state subsidies to education by correspondence. Social and Labour Bulletin, 1975, (3), 342.

Social and Labour Bulletin. Canada: Report on educational leave. Social and Labour Bulletin, 1980, 2, 258.

Social and Labour Bulletin. Finland: New law on educational leave. Social and Labour Bulletin, 1982, 2, 261.

Social and Labour Bulletin. Japan: Financial assistance to small-scale employers for paid educational leave and vocational training. Social and Labour Bulletin, 1975, (3), 341.

Social and Labour Bulletin. Italy: Renewal of the collective agreement for the printing trade. Social and Labour Bulletin, 1979, 4, 376.

Social and Labour Bulletin. France: National agreement on continuing training of agricultural workers. Social and Labour Bulletin, 1980, 3, 358.

Sparrow, D. G. Employment training in France: Firm and worker experience. Monthly Labour Review, 1980, (June), 45.

The Labour Gazette. Labour relations around the world . . . paid educational leave. The Labour Gazette, 1972, (April), 161.

The Labour Scene. Adams wants a payroll tax to encourage skill training. The Labour Scene, 1979, 1(3).

Thomas, A. M. Education and working Canadians revisited. Paper to the orientation conference for the National Educational Study Leave Task Force, October, 1982, Ottawa.

Thomas, A. M. Paid educational leave in Australia: A report to Labour Canada. Ottawa: Labour Canada, 1980.

Thomas, A. M., Abbey, D. S., MacKeracher, D., Finestone, P., & Wyles, I. Labour Canada's labour education program. Ottawa: Labour Canada, 1982.

Thomas, A. M., & Taylor, M. Adult learning and the law: The legal foundations of adult education. Toronto: Department of Adult Education, The Ontario Institute for Studies in Education, 1983.

UAW Solidarity. Paid education leave is underway. UAW Solidarity, 1978, (October), 7.

University Affairs. AUCC outlines universities' position on paid educational leave. University Affairs, 1979, (May), 8.

van Helvoort. The Japanese working man. Vancouver: University of British Columbia Press, 1979.

Von Moltke, K., & Schnavoigt, N. Educational leaves for employees: European experience for American consideration. San Francisco: Jossey-Bass, 1977.

Whitehall, A. M., & Takezawa, S-I. The other worker. Honolulu: East West Center Press, The University of Hawaii, 1968.

Wood, J. M. An Australian report: Educational leave and the balance of skills. Work Times, 1982, (Fall), 3.

World of Work Report. Few employees use company-sponsored tuition programs, says Manpower group. World of Work Report, 1980, 5(7-8).

THIS BACKGROUND PAPER IS AVAILABLE FOR
REFERENCE AT CANADIAN RESEARCH LIBRARIES IN BOTH
OFFICIAL LANGUAGES.

THE REPORT OF THE SKILL DEVELOPMENT LEAVE TASK
FORCE, "LEARNING A LIVING IN CANADA", IS
GENERALLY DISTRIBUTED. TO RECEIVE COPIES OF THE
REPORT, CONTACT:

Enquiries and Distribution
Public Affairs
Employment and Immigration Commission
140 Promenades du Portage
Hull, Québec
K1A 0J9
(819) 994-6313

